

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) Jeffrey E. Jenkins, Esquire Jenkins & Clayman 412 White Horse Pike Audubon, NJ 08106 (856) 546-9696 Attorney for Debtor	
In Re: Joseph & Lindsay Rieger debtors	

Case No.: 16-31140

Judge: ABA

Chapter: 13

- CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**
☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**
☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by
Carrington Mortgage Services, LLC, creditor.

A hearing has been scheduled for October 17, 2017 at 10:00am

OR

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee, _____.

A hearing has been scheduled for _____, at ____.

- ☐ Certification of Default filed by _____, creditor

I am requesting a hearing be scheduled in this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support of attached hereto.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**): In our Chapter 13 case, our mortgage company has filed a motion for a relief from stay stating we are slightly behind with our post-petition payments. That is true. My husband has had some work difficulties in terms of not being able to work all the overtime that he would like, and the mortgage company says we are now six payments behind. We would be able to pay two payments immediately, and then could pay the balance of the arrears by making an extra half a payment each month until we are caught up. We think this is a reasonable proposal. Accordingly, we ask that the motion be denied.

☐ Other (**explain your answer**): _____

3. This Certification is being made in an effort to resolve the issues raised by the creditor in this motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 10.4.17

/s/ Lindsay Rieger
Lindsay Rieger, debtor

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested